



**A.I.S.E.**

**PRODUCT STEWARDSHIP  
PROGRAMME**

**ON**

**INDOOR AIR EMISSIONS FROM AIR  
FRESHENERS**

**“PSP 2016”**

Last update November 2023



# CONTENTS

Contents.....	2
THE INITIATIVE.....	3
PSP (2016): SCOPE & REQUIREMENTS.....	3
SAFETY/REGULATORY ASSESSMENT.....	4
THE COMMITMENT .....	5
TIMING .....	7
ANNEX 1: EXAMPLES OF GROUPING APPROACHES FOR SAMPLING.....	9
ANNEX 2: FINANCING .....	10
ANNEX 3: Translations of three phrases for consumer .....	11
Communication .....	11
«People suffering from perfume sensitivity should be cautious when using this product». ....	11
«Air Fresheners do not replace good hygiene practices».....	13
« <i>Ventilate the room after use</i> » .....	14
ANNEX 4: LETTER OF PARTICIPATION / COMMITMENT FOR COMPANIES.....	15
ANNEX 5: COMPLIANCE Check .....	20
ANNEX 6: BUDGET MECHANISM.....	24
ANNEX 7: PSP COMPLIANCE QUESTIONNAIRE .....	25
ANNEX 8: KPI REPORTING TABLE .....	29



## THE INITIATIVE

This Product Stewardship Programme (PSP) is an initiative of A.I.S.E. in the domain of indoor emissions from air fresheners. It is a voluntary effort from industry that builds on a series of other initiatives already undertaken by A.I.S.E. in the domain of safety assessment and sustainability. In particular, this PSP (2016) builds on the previous Air Fresheners PSP implemented since November 2007 (PSP 2007).

The aim of this PSP (2016) is to promote best practices throughout industry across Europe, concerning responsible manufacturing, communication and use of Air Fresheners, allowing consumers to make the best-informed choices about safe use of products.

## PSP (2016): SCOPE & REQUIREMENTS

### 1. FOR WHOM?

Any company that manufactures and/or places on the market Combustible Air Fresheners and Other Air Fresheners in Europe (EU, plus UK, Iceland, Norway, Lichtenstein and Switzerland) can participate, regardless of whether or not it is a member of A.I.S.E. or one of its national associations.

### 2. SCOPE

The programme applies to the following products under the remit of A.I.S.E. which emit substances which may become airborne into indoor air as a consequence of their use by the consumer:

- Non-Combustible Air Fresheners (sprays, including aerosol – mini and pump-sprays, liquid wick, gel, potpourris, electrical devices, car fresheners).
- Combustible Air Fresheners in scope are perfumed and non-perfumed candles.

Companies committing to the Project shall ensure that all the products in their portfolio meet the requirements described under the commitment.

In addition, it should be clarified that the PSP applies to the products that a company markets. If a company produces both for its own marketing portfolio and as a contractor for a third party, the PSP applies only to the products in the company's own portfolio. Marketing of the products supplied to the third party is out of control of the company and, as such, out of the PSP scope for the company.



# SAFETY/REGULATORY ASSESSMENT

## 3. ALL PRODUCTS

In common with all chemical mixtures, in Europe, Combustible Air Fresheners and Other Air Fresheners must comply with the requirements of REACH Regulation (EC) 1907/2006, and the CLP Regulation (EC) 1272/2008 and any other applicable legislation, such as the general Product Safety Directive (2001/95/EC) and the Aerosol Dispenser Directive (75/324/EEC). In compliance with REACH, information about substances in the products is systematically gathered for their individual effects and for their identified uses and exposures derived from them. The information on hazard effects is used for CLP classification of substances and mixtures. Both the effects and exposure information are used for assessing the risk posed by the substances and to ensure that such risks are either not significant or adequately controlled by the implementation of appropriate risk management measures.

For substances in products which may become airborne, assessment of consumer exposure needs to be undertaken considering specific emission exposure limits/guideline values. Assessment of consumer exposure may need to be undertaken by means of:

- Exposure modelling to determine exposure levels (e.g. BAMA, ConsExpo 1-Box Model, 2-Box Indoor Air Dispersion Model, CONTAM Building Model.)<sup>1</sup>
- Confirmatory environmental chamber testing where exposure modelling indicates a potential issue in regard to agreed emissions limits.

All products may contain substances which are not intentionally added when formulating, but which may be “carried-over” during manufacturing and whose presence in unavoidable in the final products and, therefore, may also become airborne. Likewise, further assessment of consumer exposure needs to be undertaken in a similar manner as described above.

## 4. COMBUSTIBLE AIR FRESHENERS (CANDLES)

While the REACH assessment described above concerns ingredients (substances formulated into products), substances emitted as part of a combustion process require a dedicated assessment, which goes beyond the REACH assessment.

With the aim of addressing this issue, in 2010 A.I.S.E. initiated a project to develop a method to measure emissions from combustible air fresheners. On the basis of this work, three CEN standards have been developed with active involvement of A.I.S.E. and the European candle industry (ECA, AECM).

The CEN standards cover:

1. Development of standardised test methods for the emission of substances coming from the intended use of Combustible Air Fresheners and that may have effects on health.
2. Methodology for the evaluation of test results and calculation of emissions/exposure.
3. Information for the consumers to be supplied by the manufacturers of Combustible Air Fresheners, in addition to those already in use for candles in existing standards.

---

<sup>1</sup> Inputs for the exposure modelling can be provided in an harmonized way by using tools such as the SCEDs



Thus, a risk assessment for specific substances emitted from the combustible air fresheners, such as benzene, formaldehyde and naphthalene, can be derived.

## THE COMMITMENT

Beyond fulfilling the mandatory requirements prescribed by the applicable pieces of legislation, companies participating in the A.I.S.E. Product Stewardship Programme 2016 on Indoor Air Emissions from Air Fresheners PSP (2016) commit to apply the following, specifically developed, set of voluntary rules and standards to their products in the following areas:

### 5. SAFETY

All ingredients and substances used in Non-Combustible Air Fresheners and Combustible Air Fresheners in scope (Candles) shall be subject to risk assessment as described in section 4.

The exposure values shall show that the following substances when emitted by a single product unit do not exceed their respective WHO limits. <sup>2</sup>

- **Formaldehyde – 100 µg/ m<sup>3</sup>** (30 minutes exposure)\*
- **Benzene - 0.17 µg/m<sup>3</sup>** (air concentration for excess lifetime risk of leukaemia 1/1000000) \*\*
- **Naphthalene – 10 µg/m<sup>3</sup>** (annual average concentration) \*\*

\* Short term peak – Referred to as STPC in EN 16739:2015

\*\* Time Weighted Average – Referred to as TWA in EN 16739:2015

Where the company manufactures and/or places on the market a combustible air freshener product, e.g. perfumed candles, it shall, in addition to complying with all relevant legislation, adopt the latest relevant CEN standards. Those available at the time of the PSP (2016) publication are:

2WHO guidelines for indoor air quality: selected pollutants, 2010

- EN 15426:2007 – Candles. Specification for sooting behaviour
- EN 15493:2007 – Candles. Specification for fire safety
- EN 16738:2015 – Emission safety of combustible air fresheners - Test Methods
- EN 16739:2015 – Emission safety of combustible air fresheners - Methodology for the assessment of test results and application of recommended emission limits

### 6. SAMPLING

The test method described in the EN 16738:2015 is a design test. It serves a safety purpose for the qualification of products and the manufacturing process.

This test shall be performed on an appropriate, representative type of combustible air fresheners. This test should be repeated, at the minimum, at every substantial design change in product formulation or manufacturing process, if this change may be expected to have an impact on emissions. Test results, as well as any type of rationale developed to justify the need to test a specific product type, must be carefully documented and made available in case asked to prove compliance with the voluntary measures described in the programme.

---

<sup>2</sup>WHO guidelines for indoor air quality: selected pollutants, 2010



## 7. CONSUMER INFORMATION

A risk-based communication is imperative to adequately advise consumers on the safe use of products and good handling practices. This is important to strengthen their confidence on the safe and appropriate use of air freshener products at home.

### 7.1 Product labels

The Company shall ensure that product labels are designed and labelled according to the following rules:

- Good visibility to be ensured through:
  - A good graphic/visual contrast between text and background
  - Key safety messages to be clearly indicated (e.g. via use of a text box).
- Health related information in label statements:
  - Where relevant and applicable, clear advice for safe usage of the product including maximum exposure;
  - Where applicable and following national requirements, inhalation abuse warnings for sprays using solvents and propellants;
  - In addition to mandatory labelling, the following sentences shall be added to the labels<sup>3</sup>:
    - “People suffering from perfume sensitivity should be cautious when using this product”<sup>4</sup>
    - “Air Fresheners do not replace good hygiene practices” or “Ventilate the room after use”.

For Candles, the safe use icons and/or phrases encompassed in the latest relevant CEN standard. Those available at the time of the PSP (2016) publication are:

- EN 15494:2007 – Product Safety Label
- EN 16740:2015 - Emission safety of combustible air fresheners - User safety information

### 7.2 Information on chemical composition

For all products covered by the scope of the PSP (2016), the company shall make all information on chemical composition of the mixture available to the Poison Centres in accordance with Article 45 of CLP Regulation (EC) 1272/2008 or according to Annex VII C of Regulation (EC) No 648/2004, as appropriate.

In addition, the company shall make the mixture chemical composition available to the public at large, on a website. Ingredients shall be listed in accordance with the provisions of Annex VII D of Regulation (EC) No 648/2004. Sensitising substances that are subject to labelling requirements by Regulation (EC) No 1272/2008 (as amended by Regulation (EC) No 286/2011) and/or Regulation (EC) No 648/2004 shall also be listed on the website accordingly, if they are present in the product formulation.

The website address shall appear on the product label.

### 7.3 Product shape

Notwithstanding any applicable legal requirements, the Company shall not manufacture and/or place on the market: toy-shaped or food-shaped products specifically intended to attract children.

<sup>3</sup> A.I.S.E will provide proper translation in all EU official languages for consistent use

<sup>4</sup> More specific information related to effects of products on perfume sensitivity and onto precautions to take regarding use can be provided on corporate website.

- 1) Toy-shape products in the meaning of “Directive 2009/48/EC on the Safety of Toys, “a product designed or intended, whether or not exclusively, for use in play by children under 14 years of age.”

Or

- 2) Food-shape products in the meaning of Directive 87/357/EEC of 25 June 1987 on the approximation of the laws of the Member States concerning products which, appearing to be other than they are, endanger the health or safety of consumers“, namely Products which “possess a form, odour, colour, appearance, packaging, labelling, volume or size, such that it is likely that consumers, especially children, will confuse them with foodstuffs“.

#### **7.4 Advertising**

The company shall not show young children activating the product.

The company shall not promote the product by advertisements involving pregnant women or babies.

The company shall demonstrate appropriate use and product handling in compliance with product labelling when advertising.

All product claims shall be responsible, substantiated and not misleading.

The Company shall refrain from using the absence of banned materials in a product as a marketing claim (e.g. "without CFC").

#### **7.5 Companies' communication on commitment**

Should a company wish to communicate on its participation to the initiative, any corporate communication shall use the exact following wording: “Company [name the Company] has committed to the A.I.S.E. Product Stewardship Programme on Indoor Air Emissions from Air Fresheners”. Any use in electronic corporate communication materials must include a link to the Programme Stewardship website [www.aise.eu/air-fresheners](http://www.aise.eu/air-fresheners)

No reference shall be made to the product brand performance.

## **TIMING**

The Product Stewardship Programme on Indoor Air Emissions from Air Fresheners (2016) is open for signature starting from 1 April 2016.

The commitment refers to products that are manufactured and/or placed on the market as follows:

- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Safety’, ‘Product labels’, ‘Information on chemical composition’, ‘Product shape’, ‘Advertising’ and ‘Companies’ communication on commitment’ apply to all products;
- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to the newly developed combustible air freshener products (candles) not already in the portfolio;
- after 1 October 2020 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to all combustible air freshener products (candles).

If the company is committed to apply the PSP (2007), in such case, the requirements of the first PSP apply until 30 September 2017.





The Air Fresheners Product Stewardship Programme (2007) was obsoleted on the compliance deadline (1/10/2017).

For companies applying for joining the PSP 2016 in a date after October 2017, then a similar timeline of three years for application of the requirements applies.





# ANNEX 1: EXAMPLES OF GROUPING APPROACHES FOR SAMPLING

The requirements for testing should be carried out on a representative number of products. A company can group products together to assess what sample is representative of its portfolio. A company would then have to be able to provide a sound rationale for their grouping approach. Some examples of grouping justification could be:

## 1. Example 1:

If a company can group their combustible air fresheners portfolio into groups with similar characteristics, testing efforts can be reduced by focusing on the air freshener(s) that have the worst expected emissions based on expert assessment. If these “worst case” candles meet the emission requirements, it can be reasonably assumed that the other candles in this group are fine too. For example:

If there are different shapes and sizes of scented candles, e.g. filled glasses in different sizes and pillar candles in different diameters, and use various different fragrances.

Firstly, the sizes that have the highest hourly burn rate within these different shapes should be identified. Typically those with the largest diameter and therefore the largest wick, and take these as the “worst case” candles in terms of shape and burn rate.

Secondly, the different fragrances used in the company’s candles must be identified. Take the candles with the highest fragrance load as the “worst case” candles in terms of fragrance. It might also make sense to test different fragrances if their characteristics are significantly different.

## 2. Example 2:

If a company’s portfolio of combustible air fresheners produced can be divided in four families, then four tests can be identified. Example of how grouping could have been done: Two different fragrances are used in the formulations, which allow splitting the candles in two groups. For the two groups, two different wicks are used in 3/8 different shapes given to the candles. Therefore, each group can be split into two subgroups. No further differentiation is needed based on the formulation because two different vegetable waxes can be used but they do have the same hazard profile and identical burning point.

In order to be compliant to the PSP, a reasoning must be given to substantiate the grouping approach to demonstrate why the tested candles are expected to emit the highest emissions within this group.



## ANNEX 2: FINANCING

A.I.S.E. will establish a separate dedicated budget to support all expenses related to this project. The mechanism of the financing is the following:

Each company joining the initiative is expected to contribute financially to this project on a yearly basis. The financial contribution will be calculated on the basis of the company EU Value Market Share (VMS) for the previous year for the products covered in the scope of this PSP. However, no company shall pay less than the flat minimum administrative fee of 1.000 € per year.

All estimated VMS are collected on a confidential basis by the A.I.S.E. Secretariat and are based on historical data provided by independent third parties (e.g., ACNielsen, GFK, Euromonitor).

This principle will apply as described from 2017 onwards.

For the year 2016, which is the year of preparation and launch of the project, the founding A.I.S.E. companies who contributed to its development will pay an equal share each of the costs estimated for 2016 to put the project in place. Every other member that joins the initiative in the course of the year 2016 is asked to contribute of a fixed amount of 1.500 € invoiced at the time of commitment.

At the end of each year, a reconciliation of the actual costs of the PSP and the yearly fees paid by the supporting companies will be done. This will take into account the actual costs of the project and the total number of signatories for that year.

The proposed mechanism aims at covering the actual costs of the project, not at making any profit. In case the mechanism proposed will generate extra-income at the end of a calendar year, this won't be retained by A.I.S.E. but rather considered for the funding of the following year.

Note: The most recent budget estimations for this project will be made available by A.I.S.E. Secretariat upon request and without the need to commit to the project.



# ANNEX 3: TRANSLATIONS OF THREE PHRASES FOR CONSUMER COMMUNICATION

*Disclaimer: These translations are provided for information only. A.I.S.E. cannot accept liability for the translations. For those phrases that are part of the official standard EN 16740:2015, official translations may be made available at a later date, when the standard will be translated by the national standardisation bodies. In such cases, please use the official translations.*

«People suffering from perfume sensitivity should be cautious when using this product».

Bulgarian	Хора, страдащи от чувствителност към парфюми, трябва да бъдат внимателни при използването на този продукт.
Czech	Osoby s přecitlivělostí na vůně by měly tento výrobek používat s opatrností.
Danish	Personer, der lider af overfølsomhed over for parfume, bør anvende dette produkt med forsigtighed.
Dutch	Mensen die overgevoelig zijn voor parfums, dienen voorzichtig te zijn bij gebruik van dit product.
Estonian	Lõhnade suhtes ülitundlikud inimesed peaksid olema selle toote kasutamisel ettevaatlikud.
Finnish	Hajusteille herkistyneiden tulee olla varovaisia käyttäessään tätä tuotetta.
French	Utiliser avec précaution en cas de sensibilité aux parfums.
German	Personen, die auf Duftstoffe empfindlich reagieren, sollten dieses Produkt mit Vorsicht verwenden.
Greek	Άτομα που έχουν ευαισθησία στα αρώματα θα πρέπει να χρησιμοποιούν με προσοχή το προϊόν.
Hungarian	Az illatokra érzékeny vásárlók használgák kellő elővigyázatossággal a terméket.
Icelandic	Fólk sem þjáist af ilmefnaofnæmi ætti að sýna varúð þegar þessi vara er notuð.



Italian	Le persone sensibili all'uso di profumo dovranno usare questo prodotto con cautela.
Latvian	Cilvēkiem, kuriem ir alerģija pret smaržvielām, lietojot šo produktu jāievēro piesardzība.
Lithuanian	Kvapams jautrūs žmonės šį produktą turėtų naudoti atsargiai.
Maltese	Nies li jbatu minn sensitività għall-fwejjaħ għandhom joqogħdu attenti meta jiġu biex jużaw dan il-prodott.
Norwegian	Personer med følsomhet overfor parfyme bør være forsiktige ved bruk av dette produktet.
Polish	Osoby cierpiące na nadwrażliwość zapachową powinny zachować ostrożność przy stosowaniu tego produktu.
Portuguese	As pessoas sensíveis a perfumes devem ter cuidado ao utilizarem este produto.
Romanian	Persoanele sensibile la substanțele parfumante trebuie să fie precaute când utilizează acest produs.
Serbian	Osobe koje su osetljive na mirise, treba da budu oprezne prilikom korišćenja proizvoda.
Slovak	Ľudia trpiaci na precitlivenosť vyvolanú parfumami by mali tento výrobok používať opatrne.
Slovenian	Ljudje, ki so (pre)občutljivi na sestavine dišav, morajo ta izdelek uporabljati previdno.
Spanish	Las personas con algún tipo de sensibilidad al perfume deben tomar precauciones al usar este producto.
Swedish	Personer som är överkänsliga mot parfym bör vara försiktiga när de använder denna produkt.
Turkish	Parfüm hassasiyeti olan kişiler bu ürünü kullanırken dikkatli olmaları gerekir.



## «Air Fresheners do not replace good hygiene practices».

Bulgarian	Ароматизаторите не заместват добрите хигиенни навици.
Czech	Osvěžovače vzduchu nemohou nahradit správné hygienické návyky.
Danish	Luftfriskere kan ikke erstatte god hygiejnepraksis.
Dutch	Luchtverfrissers kunnen goede schoonmaakgewoonten niet vervangen.
Estonian	Õhuvärskendajad ei asenda häid hügieeniharjumusi.
Finnish	Ilmanraikastajat eivät korvaa hyviä hygieniakäytäntöjä.
French	Utiliser des désodorisants ne dispense pas de suivre de bonnes pratiques d'hygiène.
German	Raumdüfte sind kein Ersatz für gute Haushaltshygiene.
Greek	Τα αποσμητικά χώρου δεν αντικαθιστούν τη σωστή υγιεινή.
Hungarian	A légfrissítők használata nem helyettesíti a megfelelő higiéniát.
Icelandic	Lofffriskunarefni koma ekki í stað góðra hollustuhátta.
Italian	I deodoranti per l'ambiente non sostituiscono le buone pratiche igieniche.
Latvian	Gaisa atsvaidzinātāji nevar aizvietot pareizu higiēnas praksi.
Lithuanian	Oro gaivikliai nepakeičia geros higienos praktikos.
Maltese	Fresheneres ta' l-arja ma jissostitwixxux prattici ta' igjene tajba.
Norwegian	Luftfriskere erstatter ikke gode hygienerutiner.
Polish	Odświeżacze powietrza nie mogą zwolnić z przestrzegania zasad postępowania w zakresie higieny.
Portuguese	Os ambientadores não substituem as boas práticas de higiene.
Romanian	Produsele pentru împrăspătarea aerului din încăperi nu înlocuiesc bunele practici de igienă.
Serbian	Osveživači vazduha ne zamenjuju dobru higijensku praksu.
Slovak	Osviežovače vzduchu nenahrádzajú dodržiavanie správnej hygieny.
Slovenian	Uporaba osvežilcev zraka ne nadomešča dobrih higienskih navad.
Spanish	El ambientador no sustituye los buenos hábitos de higiene.
Swedish	Luftfräschare ersätter inte goda hygienvanor.
Turkish	Hava şartlandırıcılar iyi hijyen uygulamalarının yerini alamaz.

## «Ventilate the room after use»

Bulgarian	Проветрете помещението след употреба.
Croatian	Poslije uporabe prozračite prostoriju.
Czech	Po použití vyvětrejte místnost.
Danish	Luft ud efter brug.
Dutch	Na gebruik de ruimte ventileren.
English	Ventilate the room after use.
Estonian	Ruum pärast kasutamist õhutada.
Finnish	Tuuleta huone käytön jälkeen.
French	Aérer la pièce après utilisation.
German	Nach Anwendung Raum lüften.
Greek	Εξαερίζετε το χώρο μετά από κάθε χρήση.
Hungarian	Használat után alaposan szellőztesse ki a helyiséget.
Icelandic	Loftræstið herbergið eftir notkun.
Italian	Aerare il locale dopo l'uso.
Latvian	Pēc lietošanas izvēdināt telpu.
Lithuanian	Panaudojus išvėdinti patalpą.
Maltese	Ventilazzjoni tajba fil-kamra hija rikjesta wara l-użu.
Montenegrin	Poslije upotrebe provjetrite prostoriju.
Norwegian	Luft ut værelset etter bruk.
Polish	Po użyciu wywietrzyć pomieszczenie.
Portuguese	Ventilar o local após utilização.
Romanian	Aerisiți încăperea după utilizare
Russian	Проветривайте помещение после использования!
Serbian	Posle upotrebe provetrite prostoriju.
Slovak	Po použití v miestnosti vyvetrajte.
Slovenian	Po uporabi prezračite prostor.
Spanish	Ventilar la sala después del uso.
Swedish	Ventilera rummet efter användning.
Turkish	Kullandıktan sonra kullanılan odayı havalandırınız.



# ANNEX 4: LETTER OF PARTICIPATION / COMMITMENT FOR COMPANIES

A COMMITMENT by \_\_\_\_\_  
("the Company") with a principal place of business at \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

("Address Headquarters") to the **A.I.S.E. Stewardship Programme on Indoor Air Emissions from Air Fresheners** ("the Project") of the Association Internationale de la Savonnerie, de la Détergence et des Produits d'Entretien, A.I.S.E., AISBL with its registered office at Boulevard du Souverain 165, 1160 Brussels, Belgium ("A.I.S.E."), dated \_\_\_\_\_, 20 \_\_\_\_\_

## WHEREAS

A.I.S.E. has engaged into promoting sustainability and communication on best and safe use of products to consumers through a series of voluntary initiatives;

A.I.S.E. has the view that these voluntary initiatives should encompass Air Fresheners which have become an important product category used by an ever increasing number of consumers in their daily life to help improve its quality and comfort;

A.I.S.E. is willing to further enable consumers to make best-informed choices for a safe product usage, as it is willing to enhance cooperation with authorities, including at EU level, and NGOs;

In 2007 A.I.S.E. launched its first voluntary industry initiative aimed at Air Fresheners, the A.I.S.E. Air Fresheners Stewardship Programme with the aim to promote responsible consumer communication as well as the adoption of technical standards for specific Air Fresheners;

The regulatory framework has evolved and Member States are increasingly seeking to regulate emissions from Air Fresheners, hence the necessity to update the Air Fresheners Stewardship Programme to keep it meaningful;

A.I.S.E. has set up a new industry voluntary initiative to replace the initial Stewardship Programme, the A.I.S.E. Stewardship Programme on Indoor Air Emissions from Air Fresheners (the "Project");

The Project will promote best practice through responsible manufacturing, communication on use of Air fresheners;

The Project officially opens on 1 April 2016, which allows companies to sign the Letter of Commitment from that date onwards.

It is a fundamental part of the A.I.S.E. policy, and as such this Project, to act always in compliance with all applicable laws, in particular with competition law, in pursuing its goals.

The Company has applied to the A.I.S.E. to be recognised as being a participant to the Project and has agreed to make the commitment set out below;

The A.I.S.E. is satisfied that the Company manufactures and/or places on the market<sup>1</sup> in Europe (EU + EFTA countries which includes Iceland, Liechtenstein, Norway, Switzerland, and the UK hereinafter the Territory) air freshener products among the following categories: combustible Air



Fresheners (among which perfumed candles and incense) and/or other Air Fresheners (among which sprays - including aerosol – mini and pump-sprays, liquid wick, gel, potpourris, electrical devices, car fresheners (the “Products”) and as such meets the Eligibility Requirements of the Project;

The Project is open to all companies which meet all applicable conditions of the Project, irrespective of their size and whether they are:

- A.I.S.E. members or non-members;
- members or non-members of the National Associations of the countries in the geographical scope;
- manufacturers, distributors or importers where applicable (the Project addresses both branded products and private labels – see also footnote<sup>5-4</sup>);
- companies established within or outside the Territory;
- companies intending to come on the market in the Territory with products meeting the Project’s requirements.

The Company **HEREBY COMMITS** (“Commitment”) to the Project in respect of its Air Freshener operations (“Operations”) placed onto the Territory.

**WHEREBY** the Company shall

- Strive to meet the objectives of the Project;
- Strive to do nothing that may be detrimental to the aims of the Project or that may bring the Project, fellow Project participants, A.I.S.E. or its members into disrepute;
- Endeavour to always act in strict compliance with competition law and all relevant legislation, and internationally recognised guidelines and standards (e.g. WHO, IFRA/EFFA for fragrances).
- Implement all the elements set out in the Company’s commitment as set out in Annex 1;
- Implement all the requirements set out in the Company’s commitment and in the corresponding sections of the Project Description in accordance with the timeline thereafter:
- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Safety’, ‘Product labels’, ‘Information on chemical composition’, ‘Product shape’, ‘Advertising’ and ‘Companies’ communication on commitment’ apply to all products;
- after 1 October 2017 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to the newly developed combustible air freshener products not already in the portfolio;
- after 1 October 2020 the requirements in “THE COMMITMENT” section under ‘Sampling’ (i.e. the tests on emissions) apply to all combustible air freshener products.

If the Company is committed to the initial Product Stewardship Programme of 2007 at the time of signature, it shall continue to apply the requirements of the 2007 Product Stewardship Programme until 30 September 2017.

---

<sup>5</sup> For the purpose of this Agreement, the Company “places on the market” when it: 1) owns the Products’ brands (the Company may be an own brand manufacturer or a retailer), or 2) imports the Products from outside EU or EFTA countries



- For companies applying for joining the PSP 2016 in a date after October 2017, then a similar timeline of three years for application of the requirements applies.
- Collaborate with the independent auditor commissioned by A.I.S.E. to carry out compliance checks on the Project's signatories and respond to the questionnaire displayed in Annex 5. Should the Company be a retailer, it shall liaise with its supplier to ensure that the questionnaire and the information needed by the auditor are made available to the auditor in writing;
- Submit to A.I.S.E. on an annual basis before 15 April of year +1 the data and information required to show its performance against the Key Performance Indicators (KPI) identified in Annex 8 ensure that such data and information are correct and complete;
- Contribute to its fair share of costs (as calculated herein) related to the Project on a yearly basis as laid down in Appendix 3. This Commitment shall remain in full force and effect until the end of the Project life. It may either be terminated:
  - a) by the Company at any time serving not less than two (2) months' written notice upon A.I.S.E. of its withdrawing its subscription to the Project or
  - b) by A.I.S.E. serving no less than twelve (12) months prior notice upon the Company following a Board decision to end the Project;
  - c) by A.I.S.E. serving not less than two (2) months' prior notice upon the Company following the Company's failure to meet the material requirements under the Project and/or this Commitment, provided, however, that A.I.S.E. must provide the Company with written notice to the Headquarters' Address specifying the Company's material failure or material breach.

The following procedure shall be followed:

- A.I.S.E. reserves the rights to verify the Company's compliance to the Project's requirements.
- As soon as A.I.S.E. becomes aware of an alleged infringement by a Company, it will write to that Company giving full particulars of the event that might constitute an infringement of the Commitment taken, including the time period to remedy the infringement. The Company shall reply in writing within twenty-eight (28) days.
- In the event that the Company agrees its behaviour does constitute an infringement of its Commitment, it shall remedy the breach within sixty (60) days (not including the twenty-eight (28) days indicated above) as requested by A.I.S.E. in the letter referred to above.
- If such failure/breach is cured by the Company within sixty (60) business days from receipt of such notice the termination by A.I.S.E. for the respective failure or breach shall be null and void.
- In the event that A.I.S.E. and the Company do not come to an agreement on the alleged infringement, A.I.S.E. may refer the matter to an independent verifier whose assessment will be definitive for the purpose of assessing the infringement.
- If the verification carried out shows proof of an infringement, A.I.S.E. reserves the right to charge the Company a fee covering the administrative expenses incurred by the A.I.S.E. for this verification up to ten thousand (10,000) Euros when infringements are deemed to have taken place, payable within twenty-eight (28) days. Where the verifier confirms the infringement, the Company will be requested by A.I.S.E. to remedy the infringement within sixty (60) days. The remedy may include a requirement to cease



use of the on-pack communication material on the infringing products until the infringement has been remedied.

Termination may also be sought for the Project if the breach is not remedied, in the country where the breach has taken place and has not been remedied, or for the whole Project. It signifies that the Company shall cease to present itself as a participant to the Project in its corporate communication within two months from notification of termination by A.I.S.E. The commitments and rights, duties and responsibilities of the Company and A.I.S.E. under this Agreement shall continue in full force and effect during any notice period.

If any provision or term of this Agreement or any part thereof shall become or be declared illegal, invalid or unenforceable for any reason whatsoever such term or provision shall be divisible from this Agreement and shall be deemed to be deleted from this Agreement provided always that if such deletion substantially affects or alters the commercial basis of this Agreement the parties shall negotiate in good faith to amend and modify the provisions and terms of this Agreement as may be necessary or desirable in the circumstances.

Any Company dissatisfied with any decision made by A.I.S.E. in relation to the Project which may prejudice its interests, with the exclusion of decisions following which participation to the Project is not granted, may refer the matter to the A.I.S.E. Board who will render a decision, after considering the Company's representations.

If the Company wishes to challenge the decision rendered by the Board or an A.I.S.E. decision following which the Company is refused participation to the Project, the matter shall be submitted solely and exclusively to binding arbitration in accordance with the rules and procedure of the Belgian Center for Mediation and Arbitration (CEPANI).

The decision of the arbitrators shall be final and binding upon the parties and judgement upon award may be entered into and enforced by any court having jurisdiction thereof. It is further agreed between the parties, that any hearing shall be held in Brussels, Belgium.

In construing and interpreting this Agreement, the arbitrators shall be bound by and shall apply the laws of Belgium. It is also further agreed that the arbitral tribunal shall be composed of three (3) arbitrators, and that the proceedings shall be conducted in the English language.





.....  
(Signature) Authorised to sign on behalf of the Company (Date)

..... (Name)

..... (Position)



# ANNEX 5: COMPLIANCE CHECK

## 2.1. Compliance template questionnaire

### *Identification*

Organisation name:

### *Contact person*

Name:

Email:

Phone number:

## 1. Preamble

### a. PSP (2016)

This Product Stewardship Programme (PSP) is an initiative of A.I.S.E. in the domain of indoor emissions from air fresheners. It is a voluntary effort from industry that builds on a series of other initiatives already undertaken by A.I.S.E. in the domain of safety assessment and sustainability. In particular, this PSP (2016) builds on the previous Air Fresheners PSP implemented since November 2007 (PSP 2007). The aim of this PSP (2016) is to promote best practices throughout industry across Europe, concerning responsible manufacturing, communication and use of Air Fresheners, allowing consumers to make the best informed choices about safe use of products.

### b. Who should answer the questionnaire

To monitor the progresses of the programme and to assess penetration and efficacy of the measures that are introduced with the PSP, a series of KPIs has to be reported every year by the signatories. Besides that, to ensure reliability of the reporting process and, therefore, give credibility to the entire programme, the annual reporting of the KPIs is coupled with a compliance check carried out by an independent third-party auditor. The check is done by asking (some of) the signatories to answer a questionnaire where explanations on the KPI data collection methods and additional questions on the implementation of the PSP requirements that are not directly subject to KPI reporting.

If your organisation has received this questionnaire it means that for the current year it has been identified as (one of) the sample company(ies) to be verified.

The questionnaire should be answered by a competent person. In case different people need to cooperate to answer the questionnaire, a single contact point has to be provided because the auditor might need to contact the organisation in case additional information or clarifications are needed.

In case the signatory of the PSP is a retailer, the retailer should liaise with its supplier to fill in this questionnaire. The auditor doesn't need to be directly in contact with the supplier and the contact details indicated in the present form can be those of the retailer. However, the retailer should have proof in the form of a written communication that its supplier ensures compliance to the PSP requirements that are not under the direct control of the retailer itself.

### c. Data handling

The information that will be provided by the organisation by answering the questionnaire will be treated by the third-party auditor under strict confidentiality and it will be used for monitoring purposes. It won't be further distributed as such nor to A.I.S.E. neither to its members. (Add GDPR reference) Data handling will also be compliant with A.I.S.E.'s privacy policy concerning the processing and use of personal data.

### d. What will be the use of the questionnaire outcome

The information that will be provided by the different organisations verified under the compliance check by answering the questionnaire will be used by the third party auditor to derive figures and statistics as well as to identify weaknesses and strengths in the PSP requirements' implementation. These general figures will be publicly used for communication and advocacy purposes.

## 2. Questions on PSP requirements

**Question 1:** *How many types of combustible air fresheners does your organisation produces/places on the market?*

Please provide a numerical answer to this question. With "type of combustible air fresheners" it is meant combustible air fresheners with a different formulation. Air fresheners with different shape but same formulation are considered as being the same type.

Example of a possible answer: 15

**Question 2:** *In how many "families" can these types of combustible air fresheners be grouped and based on which criteria?*

Please provide an explanation on the way your organisation has divided the combustible air fresheners' formulations in different families. If the decision was supported the opinion of an expert, please make sure this person can be contacted in case of questions.

Example of a possible answer:

The combustible air fresheners produced by the organisation can be divided in four families. Two different fragrances are used in the formulations, which allow splitting the candles in two groups. For the two groups, two different wicks are used in different shapes given to the candles. Therefore, each group can be split into two sub groups.

No further differentiation is needed based on the formulation because two different vegetable waxes can be used but they do have the same hazard profile and identical burning point.

**Question 3:** *How many design tests have been performed?*

Please note that sampling test results should be formally recorded. The test report should be written according to scientific best practice and should be self-contained with a description of the method used, the results, the interpretation of the results and the conclusion (for both good laboratory practice and in order to allow for easy auditing as necessary, according to both the PSP and to present to regulatory or other external bodies as required). The format of the report should follow good scientific practice. Where read-across from one set of products and test data to another set has been used then this should be documented.

Please provide an explanation of the design tests performed and the rationale to justify that the tests performed do cover the group of combustible air fresheners. If your organisation hasn't



tested all the groups identified under question 2, please explain why. If the decision was supported by the opinion of an expert, please make sure this person can be contacted in case of questions. If the decision was supported by a study, please reference it.

Example of a possible answer:

The organisation performed six design tests. A test has been performed per each sub-group of combustible air fresheners identified. The type of combustible air freshener with the highest concentration of fragrance in each sub-group has been tested. Per each group also one type with a lower concentration of the fragrance has been tested to make sure that the emissions follow a dose-response pattern and, therefore, the assumption of testing the highest concentration is the most conservative.

**Question 4:** *Which data has been used to define consumer habits in case of testing on combustible air fresheners other than scented candles?*

Please provide here an explanation of the source of data used in the assessment of data coming from the test results in case of 'other combustible air fresheners' as referred to in the standard EN 16739:2015 under section 4.1.2.2. In case company consumer data or other studies have been considered, please indicate them here.

Example of a possible answer:

The organisation had commissioned two years ago for marketing research purposes a study on the consumer habits related to incense sticks. These data have been used as a reference.

**Question 5:** *Has the organisation had any external control?*

Please report if your organisation had any control on its products that was not directly related to the organisation internal process of verification. For instance, report here if your organisations' products have been tested in the context of NGOs campaigns or if consumers' organisations/occupational safety/labour inspectors have ever requested information that is part of the PSP commitment. Please comment on the outcome of these controls. The feedback should be qualitative to respect confidentiality.

The answer to this question is optional but it would help monitoring on going initiatives and alignment of the PSP with them; therefore, its efficacy and adequacy.

Example of a possible answer:

One product type manufactured by the organisation was subject to a control on the pictograms on the label in the context of a national governmental campaign on consumers' information. The outcome of such control was positive.

### 3. Questions on KPIs reporting

**Question 6:** *How does your organisation ensure that the KPI reporting is done in compliance with the PSP requirements?*

Please provide an explanation on the way the organisation has organised the collection of the data for the KPI reporting and ensures that they are reliable and representative.

Example of a possible answer:



The organisation has appointed a person who is responsible for gathering and ensuring consistency of the data used for the KPI reporting. This person collects twice a year data from the different manufacturing sites of the companies related to the numbers of air fresheners produced and/or placed on the market. Also, the managers of the QA departments of the different manufacturing sites have been trained on the requirements of the PSP.

In case for a certain site the numbers differ significantly from one check to the other, a request is sent to the manufacturing site to investigate.

A record of such periodic checks is kept by the responsible person and it can be provided upon request to a third party auditor to ensure compliance with PSP requirements.

## **2.2. KPI reporting**

See annex 8



## ANNEX 6: BUDGET MECHANISM

A.I.S.E. will establish a separate dedicated budget to support all expenses related to this project. The mechanism of the financing is the following:

Each company joining the initiative is expected to contribute financially to this project on a yearly basis. The financial contribution will be calculated on the basis of the company EU Value Market Share (VMS) for the previous year for the products covered in the scope of this PSP. However, no company shall pay less than the flat minimum administrative fee of 1.000 € per year.

All estimated VMS are collected on a confidential basis by the A.I.S.E. Secretariat and are based on historical data provided by independent third parties (e.g., ACNielsen, GFK, Euromonitor).

This principle will apply as described from 2017 onwards.

For the year 2016, which is the year of preparation and launch of the project, the founding A.I.S.E. companies who contributed to its development will pay an equal share each of the costs estimated for 2016 to put the project in place. Every other member that joins the initiative in the course of the year 2016 is asked to contribute a fixed amount of 1.500 € invoiced at the time of commitment.

At the end of each year, a reconciliation of the actual costs of the PSP and the yearly fees paid by the supporting companies will be done. This will take into account the actual costs of the project and the total number of signatories for that year.

The proposed mechanism aims at covering the actual costs of the project, not at making any profit. In case the mechanism proposed will generate extra-income at the end of a calendar year, this won't be retained by A.I.S.E. but rather considered for the funding of the following year.





# ANNEX 7: PSP COMPLIANCE QUESTIONNAIRE

*A.I.S.E. Product Stewardship Programme on Indoor Air Emissions from Air Fresheners (2016)*

## Identification

Organisation name: \_\_\_\_\_

## Contact person

Name: \_\_\_\_\_

Email: \_\_\_\_\_

Phone number: \_\_\_\_\_

## 1. Preamble

### a. PSP (2016)

This Product Stewardship Programme (PSP) is an initiative of A.I.S.E. in the domain of indoor emissions from air fresheners. It is a voluntary effort from industry that builds on a series of other initiatives already undertaken by A.I.S.E. in the domain of safety assessment and sustainability. In particular, this PSP (2016) builds on the previous Air Fresheners PSP implemented since November 2007 (PSP 2007). The aim of this PSP (2016) is to promote best practices throughout industry across Europe, concerning responsible manufacturing, communication and use of Air Fresheners, allowing consumers to make the best informed choices about safe use of products.

### b. Who should answer the questionnaire

To monitor the progress of the programme and to assess penetration and efficacy of the measures that are introduced with the PSP, a series of KPIs has to be reported every year by the signatories. Besides that, to ensure reliability of the reporting process and, therefore, give credibility to the entire programme, the annual reporting of the KPIs is coupled with a compliance check carried out by an independent third party auditor. The check is done by asking (some of) the signatories to answer a questionnaire where explanations on the KPI data collection methods and additional questions on the implementation of the PSP requirements that are not directly subject to KPI reporting.

If your organisation has received this questionnaire it means that for the current year it has been identified as (one of) the sample company(ies) to be verified.

The questionnaire should be answered by a competent person. In case different people need to cooperate to answer the questionnaire, a single contact point has to be provided because the auditor might need to contact the organisation in case additional information or clarifications are needed.

In case the signatory of the PSP is a retailer, the retailer should liaise with its supplier to fill in this questionnaire. The auditor doesn't need to be directly in contact with the supplier and the contact details indicated in the present form can be those of the retailer. However, the retailer should have proof in the form of a written communication that its supplier ensures compliance to the PSP requirements that are not under the direct control of the retailer itself.



### c. Data handling

The information that will be provided by the organisation by answering the questionnaire will be treated by the third party auditor under strict confidentiality and it will be used for monitoring purposes. It won't be further distributed as such nor to

A.I.S.E. neither to its members. (Add GDPR reference) Data handling will also be compliant with A.I.S.E.'s privacy policy concerning the processing and use of personal data.

### d. What will be the use of the questionnaire outcome

The information that will be provided by the different organisations verified under the compliance check by answering the questionnaire will be used by the third party auditor to derive figures and statistics as well as to identify weaknesses and strengths in the PSP requirements' implementation. These general figures will be publicly used for communication and advocacy purposes.

## 2. Questions on PSP requirements

**Question 1:** *How many types of combustible air fresheners does your organisation produces/places on the market?*

Please provide a numerical answer to this question. With "type of combustible air fresheners" it is meant combustible air fresheners with a different formulation. Air fresheners with different shape but same formulation are considered as being the same type.

Example of a possible answer:

15

**Question 2:** *In how many "families" can these types of combustible air fresheners be grouped and based on which criteria?*

Please provide an explanation on the way your organisation has divided the combustible air fresheners' formulations in different families. If the decision was supported by the opinion of an expert, please make sure this person can be contacted in case of questions.

Example of a possible answer:

The combustible air fresheners produced by the organisation can be divided in four families. Two different fragrances are used in the formulations, which allow splitting the candles in two groups. For the two groups, two different wicks are used in different shapes given to the candles. Therefore, each group can be split into two subgroups.

No further differentiation is needed based on the formulation because two different vegetable waxes can be used but they do have the same hazard profile and identical burning point.

**Question 3:** *How many design tests have been performed?*

Please note that sampling test results should be formally recorded. The test report should be written according to scientific best practice and should be self-contained with a description of the method used, the results, the interpretation of the results and the conclusion (for both good laboratory practice and in order to allow for easy auditing as necessary, according to both the PSP and to present to regulatory or other external bodies as required). The format of the report should follow good scientific practice. Where read-across from one set of products and test data to another set has been used then this should be documented.

Please provide an explanation of the design tests performed and the rationale to justify that the tests performed do cover the group of combustible air fresheners. If your organisation hasn't tested all the groups identified under question 2, please explain why. If the decision was supported by the opinion of an expert, please make sure this person can be contacted in case of questions. If the decision was supported by a study, please reference it.

Example of a possible answer:

The organisation performed six design tests. A test has been performed per each sub-group of combustible air fresheners identified. The type of combustible air freshener with the highest concentration of fragrance in each sub-group has been tested. Per each group also one type with a lower concentration of the fragrance has been tested to make sure that the emissions follow a dose-response pattern and, therefore, the assumption of testing the highest concentration is the most conservative.

**Question 4:** *Which data has been used to define consumer habits in case of testing on combustible air fresheners other than scented candles?*

Please provide here an explanation of the source of data used in the assessment of data coming from the test results in case of 'other combustible air fresheners' as referred to in the standard EN 16739:2015 under section 4.1.2.2. In case company consumer data or other studies have been considered, please indicate them here.

Example of a possible answer:

The organisation had commissioned two years ago for marketing research purposes a study on the consumer habits related to incense sticks. These data have been used as a reference.

**Question 5:** *Has the organisation had any external control?*

Please report if your organisation had any control on its products that was not directly related to the organisation internal process of verification. For instance, report here if your organisations' products have been tested in the context of NGOs campaigns or if consumers' organisations/occupational safety/labour inspectors have ever requested information that is part of the PSP commitment. Please comment on the outcome of these controls. The feedback should be qualitative to respect confidentiality.

The answer to this question is optional but it would help monitoring on going initiatives and alignment of the PSP with them; therefore, its efficacy and adequacy.

Example of a possible answer:

One product type manufactured by the organisation was subject to a control on the pictograms on the label in the context of a national governmental campaign on consumers' information. The outcome of such control was positive.

### 3. Questions on KPIs reporting

Question 6: How does your organisation ensure that the KPI reporting is done in compliance with the PSP requirements?

Please provide an explanation on the way the organisation has organised the collection of the data for the KPI reporting and ensures that they are reliable and representative.

Example of a possible answer:



The organisation has appointed a person who is responsible for gathering and ensuring consistency of the data used for the KPI reporting. This person collects twice a year data from the different manufacturing sites of the companies related to the numbers of air fresheners produced and/or placed on the market. Also, the managers of the QA departments of the different manufacturing sites have been trained on the requirements of the PSP.

In case for a certain site the numbers differ significantly from one check to the other, a request is sent to the manufacturing site to investigate.

A record of such periodic checks is kept by the responsible person and it can be provided upon request to a third party auditor to ensure compliance with PSP requirements.



# ANNEX 8: KPI REPORTING TABLE



20210430195852-a\_i\_s\_e\_air\_fresheners\_ps

Country	Active market?	Number of products manufactured and/or placed on the market (all types of Air Fresheners) under the PSP scope during the reporting period	Number of combustible air fresheners under the PSP scope during the reporting period
Not specified (only total)	-		
Austria			
Belgium			
Bulgaria			
Croatia			
Cyprus			
Czech Republic			
Denmark			
Estonia			
Finland			
France			
Germany			
Greece			
Hungary			
Iceland			
Ireland			
Italy			
Latvi			
Liechtenstein			
Lithuania			
Luxembourg			
Malta			
Netherlands			
Norway			
Poland			
Portugal			
Romania			
Slovakia			
Slovenia			
Spain			
Sweden			
Switzerland			
United Kingdom			

